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Attorneys for Defendants

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

JOHN DOE,

Plaintiff,

v.

DONALD J. TRUMP, in his official capacity as
President of the United States of America, *et al.*,

Defendants.

Case No. 4:25-cv-03140-JSW

**STIPULATION TO EXTEND THE DUE DATE
FOR DEFENDANTS' SUPPLEMENTAL
OPPOSITION TO PLAINTIFFS' MOTION FOR
PRELIMINARY INJUNCTION; [PROPOSED]
ORDER**

The Honorable Jeffrey S. White

S.Y., *et al.*,

Plaintiff,

v.

KRISTI NOEM, in her official capacity as
Secretary of the United States Department of
Homeland Security, *et al.*,

Defendants.

Case No. 4:25-cv-3244-JSW

STIPULATION
4:25-cv-03140- JSW and related cases

ZHOUEER CHEN, *et al.*

Plaintiff,

V.

KRISTI NOEM, *et al.*,

Defendants.

SHANGSHANG WANG, *et al.*,

Plaintiffs,

V.

KRISTI NOEM, *et al.*,

Defendants.

JUNGWON KIM, *et al.*,

Plaintiffs,

V.

KRISTI NOEM, *et al.*,

Defendants.

W.B.

Plaintiff,

V.

KRISTI NOEM, *et al.*,

Defendants.

STIPULATION

4:25-cv-03140- JSW and related cases

SKY QUI,

Plaintiff,

V.

TODD M. LYONS, in his official capacity as
Acting Director of United States Immigration
and Customs Enforcement,

Defendant.

EMMA BAI,

Plaintiff,

V.

KRISTI NOEM, *et al.*,

Defendants.

J.C. *et al.*,

Plaintiffs,

V.

KRISTI NOEM, *et al.*,

Defendants.

ARYAN SHAH, *et al.*,

Plaintiffs,

V.

TODD M. LYONS,

Defendant.

STIPULATION

4:25-cv-03140- JSW and related cases

1	YIWEI HE,)	Case No. 4:25-cv-3480-JSW
2)	
	Plaintiff,)	
3)	
	v.)	
4	KRISTI NOEM, <i>et al.</i> ,)	
5)	
	Defendants.)	

On April 25, 2025, the Court set a hearing on the motions for preliminary injunction for May 13, 2025, and a briefing schedule that required Defendants' supplemental opposition to be filed by 2:00 p.m. on May 6, 2025, and Plaintiffs' replies to be filed by May 9, 2025. *See, e.g.*, Dkt. No. 24. Plaintiffs and Defendants have conferred and respectfully request the Court to grant an extension of time for Defendants' supplemental opposition to Plaintiffs' motions for preliminary injunction, and set the due date for Defendants' opposition to May 7, 2025, at 5:00 p.m. The parties make this request because Defendants need additional time to obtain additional information that may be useful to Plaintiffs' request for injunctive relief.

For *He v. Noem*, No. 4:25-cv-3480-JSW, the parties request that the Court set the due date for their joint status report to May 7, 2025. The parties respectfully request that the Court grant their stipulation.

Dated: May 6, 2025

Respectfully submitted,¹

PATRICK D. ROBBINS
Acting United States Attorney

s/ Elizabeth D. Kurlan
ELIZABETH D. KURLAN
Assistant United States Attorney

Attorneys for Defendants

Dated: May 6, 2025

s/ John Nicholas Sinodis
JOHN NICHOLAS SINODIS
Van Der Hout, LLP

Attorney for Plaintiffs

¹ In accordance with Civil Local Rule 5-1(i)(3), the filer of this document attests that all signatories listed herein concur in the filing of this document.

s/ Andre Y. Bates
ANDRE Y. BATES
DeHeng Law Offices PC

Attorney for Plaintiffs

s/ Jesse M. Bless
JESSE M. BLESS
Bless Litigation

Attorney for Plaintiffs

s/ Brad Baniyas
BRAD BANIAS
Baniyas Law

Attorney for Plaintiffs

s/ Ben Loveman
BEN LOVEMAN
Reeves Immigration Law Group

Attorney for Plaintiff

s/ Zachary R. New
ZACHARY R. NEW
Joseph and Hall P.C.

Attorney for Plaintiff

[PROPOSED] ORDER

Pursuant to the parties' stipulation, IT IS SO ORDERED. Defendants will file their supplemental opposition to Plaintiffs' motion for preliminary injunction by May 7, 2025, at 5:00 p.m.

Date:

JEFFREY S. WHITE

STIPULATION

4:25-cv-3140 JSW and related cases

United States District Judge

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STIPULATION

4:25-cv-3140 JSW and related cases